9027/RHD CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP 61 Broadway, Suite 3000 New York, New York 10006-2802 (212) 344-7042

Attorneys for Defendant Hanjin Shipping Co. Ltd.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MITSUI SUMITOMO INSURANCE CO., LTD.,

Plaintiff.

07 Civ. 6351 (HB)

-against-

M/V "HANJIN PHOENIX," her engines, tackle, boilers, etc., and HANJIN SHIPPING CO., LTD.,

Defendants.

RULE 7.1 STATEMENT

Pursuant to the provisions of Fed.R.Civ.P. 7.1, in order to enable the judges and magistrate judges of this Court to evaluate possible disqualification or recusal, I, Randolph H. Donatelli, as a member of the bar of this Court and a member of the firm Cichanowicz, Callan, Keane, Vengrow and Textor, LLP, attorneys for defendant Hanjin Shipping Co. Ltd., certify upon information and belief that defendant Hanjin Shipping Co. Ltd. is a foreign corporation that has no corporate parents, subsidiaries or affiliates that are publicly held.

Dated: New York, New York September 19, 2007 Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant Hanjin Shipping Co. Ltd.

By: s/ Randolph H. Donatelli Randolph H. Donatelli (RD-5359) 61 Broadway, Suite 3000 New York, New York 10006-2802 (212) 344-7042